



MEMORANDUM ENDORSED

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
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Valerie L. Forbes
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November 15, 2024

VIA ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Z.H.M. v. N.Y.C. Dep't of Educ., 24-cv-6096 (GHW)(KHP)

Dear Judge Woods:

I am a Special Assistant Corporation Counsel in the Office of Acting Corporation Counsel, the Muriel Goode-Trufant, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write pursuant to the Court order dated August 14, 2024 (ECF No. 6), to respectfully request an adjournment *sine die* of the Initial Pretrial Conference currently scheduled for Tuesday, November 26, 2024 at 4:00 pm, as well as the date for submission of the attendant Case Management Plan and proposed Scheduling Order. Plaintiff consents to this request. This is the first request for an adjournment. The Court should note the Defendants Answer is due December 2, 2024.

The city is still in the process of conducting its internal review process and expects to begin good faith negotiations with Plaintiff within the next four weeks. The parties remain hopeful that this matter can be resolved without further burdening the Court. We respectfully request that a proposed briefing schedule be held in abeyance to allow time for the possibility of settlement.

Accordingly, Defendants respectfully request that the Court adjourn the Initial Pretrial Conference and attendant Case Management Plan and proposed Scheduling Order, *sine die*.

Thank you for considering this request.

Respectfully submitted,

/s/

cc: Jessica Cochrane (via ECF)
Julie Michaels Keegan (via ECF)

Valerie L. Forbes
Special Assistant Corporation Counsel

Application granted in part. Defendants' request for an adjournment of the initial pretrial conference, Dkt. No. 15, is granted in part. The Court will not adjourn the conference *sine die*, but it will adjourn the conference's start date. The initial pretrial conference scheduled for November 26, 2024 at 4:00 p.m. will be held on January 13, 2025 at 4:00 p.m. The joint status letter and proposed case management plan described in the Court's October 24, 2024 order are due no later than January 6, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 15.

SO ORDERED.

Dated: November 15, 2024
New York, New York

GREGORY H. WOODS
United States District Judge